

Michael G. Wilson (VA 48927)
MICHAEL WILSON PLC
P.O. Box 6330
Glen Allen, VA 23058
Telephone: (804) 614-8301
mike@mgwilsonlaw.com

Counsel to PGIM, Inc.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:)	
)	Chapter 11
LANDAMERICA FINANCIALGROUP, INC., ET AL.)	
)	Case No. 08-35994-KRH
Debtors.)	
)	(Jointly Administered)
)	

**LIMITED OBJECTION AND RESERVATION OF RIGHTS WITH RESPECT TO
MOTION TO MODIFY FINAL DECREE**

On October 9, 2019, a Motion to Modify Final Decree (the “Motion”) was filed by Bruce H. Matson, as wind-down agent and liquidation trustee (the “LFG Trustee”) for the above captioned case. The Motion included a certification that the Motion was served by electronic mail to certain limited parties.

Notwithstanding that the Motion purports to distribute \$2.8 million of estate assets to entities other than creditors, LandAmerica’s creditors were not notified of the Motion. Prudential learned of the Motion on October 11, 2019, only after the LFG Trustee sent the Motion to the personal email of the former chairman of the Liquidation Oversight Committee, a former employee of PGIM who Mr. Matson knew had previously retired.

PGIM¹ files this Limited Objection and Reservation of Rights to preserve its right to object to the substance of the Motion, which, while well-meaning, does not satisfy the LFG Trustee’s duties to creditors.

¹ PGIM and/or its affiliated investment managers manages this investment on behalf of United of Omaha Life Insurance Company, Mutual of Omaha Insurance Company, RGA Reinsurance Company and Hare & Co., Gibraltar Life Insurance Company, Ltd., and The Prudential Insurance Company of America.

Specifically, by this Limited Objection and Reservation of Rights, PGIM seeks an adjournment of the hearing on the Motion, to give it an opportunity to discuss with the LFG Trustee alternative approaches than what is set forth in the Motion. It is PGIM's position, consistent with its own fiduciary duties to its investors, that any and all material funds should inure to the benefit of creditors.

WHEREFORE, PGIM, respectfully requests that (i) the Court continue the hearing on the Motion to permit creditors, including PGIM, to properly review the relief requested by the LFG Trustee, and (ii) grant to PGIM such other and further relief as is just and proper.

Richmond, Virginia

Dated: October 15, 2019

/s/ Michael Wilson

MICHAEL WILSON PLC

Michael G. Wilson (VA 48927)

P.O. Box 6330

Glen Allen, VA 23058

Telephone: (804) 614-8301

Email: mike@mgwilsonlaw.com

Counsel to PGIM, Inc.